

## **Comment 1 for Tire Pressure Regulation (tirepres09) - 45 Day.**

First Name: MARK

Last Name: BEAULIEU

Email Address: HOLESHOTWILLIE@HOTMAIL.COM

Affiliation: AUTO REPAIR SHOP

Subject: TIRE INFLATION RULES

Comment:

I UNDERSTAND THE INTENT AND SPIRIT OF THE PROPOSAL, BUT I HAVE CONCERNS. THE CUSTOMER SHOULD BE RESPONSIBLE FOR HIS OR HER OWN ACTIONS, LETS NOT GET THAT WRONG. I CAN SEE THIS COULD BE A CAN OF WORMS AND PUT THE BLAME WHERE IT SHOULD NOT BE. IF A CUSTOMER ASKS A SHOP FOR A TIRE PRESSURE CHECK OK BUT LETS SAY THAT HE HAD LOW PRESSURE, YOU ADD AND RECORD THAT, WHICH IS MORE WORK, AND LETS SAY THEY WERE LOW JUST 15% AND THEY DROVE THAT WAY FOR A WHILE AND THEN YOU ADD AIR AND THEN THE TIRE SEPERATES AND SOMEONE GETS HURT OR KILLED, I CAN SEE US GETTING BLAMED. THATS NOT RIGHT OR MORAL. THE ONLY ONES WHO WILL BENEFIT WILL BE THE LAWYERS AND OTHERS IN THE JUDICIAL SYSTEM WHOM GET PAID. WE TELL PEOPLE ALL THE TIME THAT THERE TIRES ARE LOW, OR BAD AND THEY MAKE DECISIONS AND LIVE WITH THEM.

BESIDES ALL THE NEW CARS ARE BEING MADE WITH TIRE PRESSURE MONITORS.

DON'T DO THIS. IT WOULD BE A MISTAKE.

SINCERELY MARK BEAULIEU

OWNER OF AN AUTO REPAIR SHOP.

AND A CONSUMER

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-06 10:10:02

No Duplicates.

## **Comment 2 for Tire Pressure Regulation (tirepres09) - 45 Day.**

First Name: Phil

Last Name: Clemmons

Email Address: phil@mediablast.com

Affiliation:

Subject: What's wrong???????????

Comment:

I have lived in Southern California since 1953 and you guys are incredible. You write these rules and regulations so only people with law degrees can understand what you are saying and you have so much power that it is very scary.

Organizations like this one are one of the main reasons California is in the worst shape it has ever been in and all you people claim to have helped clean up a once beautiful place to live, when in reality, you have destroyed it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-03-02 16:42:31

No Duplicates.

### **Comment 3 for Tire Pressure Regulation (tirepres09) - 45 Day.**

First Name: Pete

Last Name: Montgomery

Email Address: [pete@pmontgomeryconsulting.com](mailto:pete@pmontgomeryconsulting.com)

Affiliation:

Subject: N2Revolution, Inc. Comments on Proposed Under Inflation Regulation

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/tirepres09/3-n2\\_revolution\\_march\\_16\\_carb\\_comments.doc](http://www.arb.ca.gov/lists/tirepres09/3-n2_revolution_march_16_carb_comments.doc)

Original File Name: N2 Revolution March 16 CARB comments.doc

Date and Time Comment Was Submitted: 2009-03-16 13:32:51

No Duplicates.

## **Comment 4 for Tire Pressure Regulation (tirepres09) - 45 Day.**

First Name: Jackie

Last Name: Miller

Email Address: info@ascca.com

Affiliation:

Subject: Automotive Service Councils of California

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/tirepres09/4-miller.pdf](http://www.arb.ca.gov/lists/tirepres09/4-miller.pdf)

Original File Name: Miller.pdf

Date and Time Comment Was Submitted: 2009-03-24 09:56:54

No Duplicates.

## **Comment 5 for Tire Pressure Regulation (tirepres09) - 45 Day.**

First Name: Dennis  
Last Name: DeCota  
Email Address: ddecota@cssara.org  
Affiliation: CSSARA

Subject: TIREPRES09  
Comment:

This mandate if enacted is the wrong approach to a very real problem. Instead of creating a liability problem for small business; the State should enact a manitory vehicle inspection program that includes tire pressure, tire condition, OBD light, smoking vehicle, wiper blade and lights inspections. Allow the free enterprize system to work by allowing business to charge for their service. This will accomplish much more than simply addressing one problem causing Greenhouse Gas Emissions.

The California Service Station and Automotive Repair Association is opposed to the regulation as submitted.

Sincerely  
Dennis DeCota  
Executive Director  
CSSARA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-03-24 04:19:21

No Duplicates.

## **Comment 6 for Tire Pressure Regulation (tirepres09) - 45 Day.**

First Name: Jonathan

Last Name: Morrison

Email Address: jmorrison@cncda.org

Affiliation: CNCDA

Subject: CNCDA Comments on Proposed Tire Inflation Regulation

Comment:

Please find attached CNCDA's comments concerning ARB's Tire Inflation Regulatory Proposal.

Attachment: [www.arb.ca.gov/lists/tirepres09/6-cncda\\_comments\\_on\\_tire\\_inflation\\_regulations.pdf](http://www.arb.ca.gov/lists/tirepres09/6-cncda_comments_on_tire_inflation_regulations.pdf)

Original File Name: CNCDA Comments on Tire Inflation Regulations.pdf

Date and Time Comment Was Submitted: 2009-03-24 16:18:14

No Duplicates.

## **Comment 7 for Tire Pressure Regulation (tirepres09) - 45 Day.**

First Name: Tracey  
Last Name: Norberg  
Email Address: [tnorberg@rma.org](mailto:tnorberg@rma.org)  
Affiliation: Rubber Manufacturers Association

Subject: Comments on the Proposed Regulation for Under Inflated Vehicle Tires  
Comment:

Please find attached pdf file containing the comments of the Rubber Manufacturers Association on the above-referenced proposed regulation. I appreciate the opportunity to submit these comments for the record and look forward to a continued dialogue with ARB on this important issue on behalf of the tire manufacturing industry.

Respectfully submitted,

Tracey Norberg  
Senior Vice President and Corporate Counsel  
Rubber Manufacturers Association

Attachment: [www.arb.ca.gov/lists/tirepres09/7-rma\\_comments\\_on\\_carb\\_check\\_and\\_inflate\\_-\\_march\\_25\\_2009\\_final.pdf](http://www.arb.ca.gov/lists/tirepres09/7-rma_comments_on_carb_check_and_inflate_-_march_25_2009_final.pdf)

Original File Name: RMA Comments on CARB Check and Inflate - March 25 2009 final.pdf

Date and Time Comment Was Submitted: 2009-03-25 11:54:21

No Duplicates.

## **Comment 8 for Tire Pressure Regulation (tirepres09) - 45 Day.**

First Name: Pamela  
Last Name: Williams  
Email Address: cra@calretailers.com  
Affiliation:

Subject: Proposed Regulation for Under Inflated Vehicle Tires:  
Comment:

March 25, 2009

To: Members, California Air Resources Board

RE: Proposed Regulation for Under Inflated Vehicle Tires:  
Agenda for March 26, 2009

The California Retailers Association opposes the current proposed draft regulations for under-inflated vehicle tires, because of the cost to retail businesses in this time of severe recession, and because we believe that the objective can be met by a much simpler regulatory approach. Our association represents retail chains that provide automotive services and repair, and tire sales and service facilities, whether attached to retail stores or free-standing.

### Summary of Regulation

The proposed regulation will require automotive service providers to purchase ANSI standard B40.1 compliant tire pressure gauges. Purchase of •gtire inflation reference manuals•h is also mandated, as is a tire pressure check on all vehicles brought in for service. Service providers must document that the check was performed, write down the actual pressure of the tire and retain records for potential inspections, audits and enforcement.

### Costs

The staff report predicts a cost of over \$100 million per year to implement the regulation. Costs include the cost of the specific tire gauges (\$25 each), the cost of the manuals (\$50 each) and the additional labor costs of checking the tires and noting the pressure. Costs will also include the annual ongoing cost of document retention (a cost particularly for small businesses, which do not have adequate on-site storage capability and must pay a document retention service).

### Reasons for Opposition

•æ It is completely unnecessary for the State to determine that only one type of tire gauge is permissible. For decades people have been able to accurately read tire gauges that were not •gANSI approved•h, and the \$25 cost of the gauge is ridiculously high. Additionally, these gauges only have a life expectancy of 2 years, so businesses must continually be replacing them.

•æ It is also completely unnecessary for the State to mandate purchase of a \$50 manual for businesses to inform their employees how to do tire pressure check. It is duplicative because the recommended tire pressure information is on the tire itself, on the



vehicle door sticker, or is calculable. This is not rocket science--\$50 manuals should NOT be required. Nor should the manuals have to be replaced and/or updated every 3 years, as the regulations state.

#### Proposed Alternative

The regulation is projected to save California 90 million gallons of gasoline (and resultant GHG emissions) by 2010, and to prolong tire life by reducing tire tread wear. In the spirit of facilitating the emission reductions per CARB's mandate, we offer the following compromise:

- Require auto service providers to conduct tire pressure checks when vehicles are brought in for service.
- Require documentation to be made at the time the tire pressure check is conducted, and require this documentation to be retained for X number of years.
- Permit auto service providers the option of documenting the tire pressure check by using their own work order system, or by using a CARB-provided format for documenting the check. In checking with our member companies, there are those who want to use a separate form provided by the State, so as not to have to redo, reprint, and revise their existing systems. There are other retailers who do not want to have to keep track of two different forms and want the ability to add documentation of tire pressure check to their service performance documentation. Allowing retailers to choose among these two options provides flexibility for different retail tradestyles and saves cost to the retailer.
- Eliminate the requirement for specific gauges and manuals to be purchased.

We believe this alternative approach secures the desired emission reduction goals while reducing cost to businesses for compliance.

Thank you for your consideration of our position.

Sincerely,

Pamela Boyd Williams  
Senior Vice President  
California Retailers Association

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-03-25 12:03:12

No Duplicates.

## **Comment 1 for Tire Pressure Regulation (tirepres09). (At Board Hearing)**

First Name: Mike

Last Name: Flanigan

Email Address: Non-web submitted comment

Affiliation:

Subject: Les Schwab Tire Centers

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/tirepres09/9-mike\\_flanigan.pdf](http://www.arb.ca.gov/lists/tirepres09/9-mike_flanigan.pdf)

Original File Name: Mike Flanigan.pdf

Date and Time Comment Was Submitted: 2009-04-01 10:41:10

No Duplicates.

## **Comment 1 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: Rod

Last Name: Miller

Email Address: rmiller@folsom.ca.us

Affiliation:

Subject: Comment on Definition Change “Automotive Service Provider (ASP)”

Comment:

Comment :

The definition change makes it unclear whether or government maintenance providers are regulated pursuant to the proposed regulation. Please clarify whether or not non-"business" entities such as governments are regulated. Government fleet pools commonly have infrequent use hence underinflated tires. What example does CARB set if its fleet is unaffected by this regulation?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-23 10:54:01

No Duplicates.

## **Comment 2 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: Rodney

Last Name: Molyneux

Email Address: rodney.m.molyneux@usps.gov

Affiliation: Govt.

Subject: Tire pressure

Comment:

Like most regulation this will not be enforcable, face just how complex this would be and drop it. You would do better to force gas stations to have working air stations that people could use. Many tire shops will check your pressures if asked and I do not believe we need laws to try to accomplish this. Please stop wasting taxpayers money and time with nonsense.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-23 11:12:42

No Duplicates.

### **Comment 3 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: Ashok

Last Name: Mathur

Email Address: mathuran@rcn.com

Affiliation: Nitrogen industry professional

Subject: Deletion of nitrogen purity reference

Comment:

Board has deleted the definition of "Pure Nitrogen" as listed in article 10, section (c), Resolution 09-25, Attachment B, Posted May 6, 2009. I ask that "Pure Nitrogen" definition be restored in the final regulatory language for the following reasons.

a. Nitrogen must be defined because it is mentioned in the document at other places and may not be clearly known to consumers and ASPs.

b. Nitrogen must be differentiated from "air" as it is referenced as an alternate inflatant.

c. Nitrogen purity must be defined otherwise its purity will be subject to misinterpretation and misrepresentation. Its use can be fraudulent resulting in overcharging of consumer. For example, ASPs may charge for "nitrogen" but use air claiming that it has 78.1% purity.

d. To avoid this confusion, a simple solution would be for CA ARB to retain the definition of "Pure Nitrogen" as listed in the original Attachment B.

Best Regards  
Ashok Mathur

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-26 07:24:28

No Duplicates.

## **Comment 4 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: Jackie

Last Name: Miller

Email Address: jmillier@amgroup.us

Affiliation: Automotive Service Councils of CA

Subject: Regulation re Under Inflated Tires

Comment:

November 2, 2009

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, California 95814

RE: Proposed Amendments to Regulation to Reduce Greenhouse Gas  
Emissions from vehicles Operating with for Under Inflated Tires

Dear Clerk:

On behalf of the Automotive Service Councils of California (ASCCA), we are writing to provide comments to the proposed amendments to the Proposed Amendments to Regulation to Reduce Greenhouse Gas Emissions from Vehicles Operating with Under Inflated Tires. The ASCCA is a statewide organization that represents 1,000 automotive repair facilities, including smog shops.

We appreciate the revisions and modifications that were made to these latest proposed regulations based upon our letter dated March 20, 2009. The ASCCA has the following additional comments and suggestions:

1) The proposed regulations should apply to all automotive service providers registered with the Bureau of Automotive Repair (BAR) that perform automotive repair services.

2) The proposed regulations are not clear as to whether the service provider must check inflation of vehicle tires while the tire is "hot" or wait for a period of time and check when the tire is "cold". This concern was raised in prior correspondence and at the Air Resources Board workshops. It still has not been adequately addressed in the proposed amended regulations.

3) The proposed regulation does not address the issue of oversized tires as well as the modification of a vehicle to accommodate such. We request that this matter be addressed in the proposed regulations.

4) As you are well aware, the BAR has regulatory oversight of the automotive repair dealers in the state. BAR has the expertise and

personnel to properly oversee the enforcement of these proposed regulation rather than the Air Resources Board. As such, we request that the BAR act as the authorized representative to enforce this regulation under existing law, that the proposed amended regulations reflect such enforcement and that Section 95550 (e) be deleted in its entirety.

5) Under current law, the BAR requires that an automotive repair dealer obtain authorization from the customer before performing any diagnoses or repairs on vehicle. These regulations do not address the situation whereby a customer refuses, for whatever reason, to provide authorization to the automotive repair dealer to have the tires checked and inflated. We further recommend that a specific exemption be included for such an instance and that such be reflected on the vehicle service invoice.

ASCCA believes that unless the above concerns are adequately addressed in the proposed regulations, the tire inflation program may not end up reducing greenhouse gas emissions and, in fact, may be more detrimental to the environment than beneficial.

Thank you for your consideration.

Sincerely,

Jackie A. Miller  
Executive Director for  
Larry Nobriga, Chair, Government Affairs Committee

CC: Glenn Davis, President  
ASCCA Board of Directors  
ASCCA Government Affairs Committee  
Jack Molodanof, ASCCA legislative advocate

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-03 11:18:13

No Duplicates.

## **Comment 5 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: Michael

Last Name: Flanigan

Email Address: mikeflanigan@flaniganlaw.com

Affiliation:

Subject: Comment Document Regarding "tirepres09."

Comment:

Attached is our comment document regarding "tirepres09" on behalf of our client, Les Schwab Tire Centers, and is being forwarded to you on November 4, 2009.

Sincerely,

Mike Flanigan  
The Flanigan Law Firm  
980 9th Street, Suite 2380  
Sacramento, CA 95814  
(916) 443-0381

Attachment: [www.arb.ca.gov/lists/tirepres09/15-les\\_schwab\\_15\\_day\\_response\\_2009.doc](http://www.arb.ca.gov/lists/tirepres09/15-les_schwab_15_day_response_2009.doc)

Original File Name: Les Schwab 15 Day Response 2009.doc

Date and Time Comment Was Submitted: 2009-11-04 10:50:27

No Duplicates.



## **Comment 6 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: HAROLD  
Last Name: HERZLICH  
Email Address: HARHERZ@JUNO.COM  
Affiliation: HERZLICH CONSULTING, INC.

Subject: HIGH PURITY NITROGEN TIRE INFLATION  
Comment:

TO BE FREE OF MISINTERPRETATION AND TO GAIN PROPER TIRE INFLATION RETENTION AND REDUCED OXIDATIVE DEGRADATION BENEFITS, IT IS VERY IMPORTANT THAT NITROGEN PURITY BE CLEARLY STATED IN ARTICLE 10, SECTION (C), RESOLUTION 09-25, ATTACHMENT B THAT WAS POSTED MAY 6, 2009.

BASED UPON PEER REVIEWED SCIENTIFIC STUDIES, THE TIRE'S INFLATION GAS REQUIRES AT LEAST 95% NITROGEN PURITY AND NOT MORE THAN 5% RUBBER WEAKENING REACTIVE OXYGEN. TO MEET THIS ESTABLISHED CHEMICAL REQUIREMENT DURING THE TIRE INFLATION PROCESS, THE NITROGEN PURITY OF THE INFLATION GAS MUST BE IN EXCESS OF 95% TO OFFSET ANY RESIDUAL OXYGEN THAT CANNOT BE EFFECTIVELY PURGED. THE READILY AND EASY COMMERCIAL AVAILABILITY OF 98% TO 99.9% NITROGEN MAKES IT REASONABLE TO HAVE THE CALIFORNIA RESOLUTION NOT CREAT CONFUSION AND CLEARLY DEFINE NITROGEN'S REQUIRED PURITY BE NO LESS THAN 98%.

THE PRESENT NON QUANTITATIVE WORDING OF "NITROGEN" INSTEAD OF THE MORE PRECISE WORDING OF "NITROGEN OF AT LEAST 98% PURITY" (IE: HIGH PURITY) WOULD ALLOW SELLERS TO INNOCENTLY OR INTENTIONALLY CONFUSE THE CONSUMER AND COMPROMISE NITROGEN'S BENEFITS AS WELL AS THE AGENCIES INTENT BY CLAIMING THAT AIR WITH IT'S NORMAL 78% NITROGEN MAKE-UP IS "NITROGEN INFLATION".

ATTACHED IS MY CV WHICH DESCRIBES MY TRAINING AND EXPERIENCE WHICH IS THE BASIS OF THIS OPINION.

Attachment: [www.arb.ca.gov/lists/tirepres09/16-xxacurrippers3.wpd](http://www.arb.ca.gov/lists/tirepres09/16-xxacurrippers3.wpd)

Original File Name: XXACURRIPPRS3.wpd

Date and Time Comment Was Submitted: 2009-11-05 12:10:28

No Duplicates.

## **Comment 7 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: Kristy

Last Name: Schieldge

Email Address: kristy\_schieldge@dca.ca.gov

Affiliation: Department of Consumer Affairs

Subject: Comments Re 15 Day Notice of Modified Text

Comment:

Message Attached

Attachment: [www.arb.ca.gov/lists/tirepres09/17-ar-m455n\\_20091109\\_091809.pdf](http://www.arb.ca.gov/lists/tirepres09/17-ar-m455n_20091109_091809.pdf)

Original File Name: AR-M455N\_20091109\_091809.pdf

Date and Time Comment Was Submitted: 2009-11-09 08:28:28

No Duplicates.

## **Comment 8 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: Jonathan

Last Name: Morrison

Email Address: jmorrison@cncda.org

Affiliation:

Subject: CNCDA Comments on Modified Tire Inflation Regulations

Comment:

Please find CNCDA's comments regarding ARB's modified tire inflation regulations attached.

Attachment: [www.arb.ca.gov/lists/tirepres09/18-cncda\\_15-day\\_comments\\_on\\_tire\\_inflation\\_regulations.pdf](http://www.arb.ca.gov/lists/tirepres09/18-cncda_15-day_comments_on_tire_inflation_regulations.pdf)

Original File Name: CNCDA 15-Day Comments on Tire Inflation Regulations.pdf

Date and Time Comment Was Submitted: 2009-11-09 08:45:48

No Duplicates.

## **Comment 9 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: Terry  
Last Name: Leveille  
Email Address: terry@caltirereport.com  
Affiliation: Rep. California Tire Dealers Association

Subject: Proposed Amendments to the Regulation to Reduce Greenhouse Gas Emissions from Vehicles Operating with Under Inflated Tires

Comment:

Mr. James Goldstene  
Executive Director  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

November 9, 2009

Proposed Amendments to the Regulation to Reduce Greenhouse Gas Emissions from Vehicles Operating with Under Inflated Tires

Dear Mr. Goldstene:

I am writing on behalf of the California Tire Dealers Association, which represents several hundred small and independent tire retailers throughout the state. While we applaud a number of changes the ARB has made in the latest draft of the proposed regulation, we still must take issue with portions of Section 95550 of Article 1, Chapter 1, Subchapter 10, Division 3, Title, California Code of Regulations.

- A number of our members use the portable "pencil" gauges that are easily accessible and clip to a worker's shirt. These gauges are generally accurate to +/- 4 psi. We support a change in Section 95550 (d) (1) (C) from the +/- 2 psi standard.

- Section 95550 (c) (14) "Unsafe Tires." While we support the proposal for Auto Service Providers not to inflate unsafe tires, in the definition portion of the regulation, Section 95550 (c), it refers to tire "age" as one of the reasons that tires become unsafe. That issue is the subject of significant debate, lawsuits, and legislation. Since NHTSA has promised further testing on the issue, and since the cause of a tire becoming unsafe is not pertinent to the definition, we suggest you simply eliminate the controversial issue of tire "age" as a causal factor and suggest the following wording for Section 95550 (c) 14:

"Unsafe Tires" means any tire considered unsafe in accordance with standard industry practices, due to tire tread wear, age, tread irregularity, or damage. Examples include any tire with exposed ply or cord, sidewall crack, bulge, knot, or ply separation.

- A minor correction is needed for Section 95550 (d) (3)

with its reference to definition (13) rather than (14): (B) the tires are determined by the automotive service provider to be unsafe, as defined in § 95550 (c) (13) (14); or

Thank you for the opportunity to comment on this important regulation.

Sincerely,

Terry Leveille  
President, TL & Associates

cc: Ejnar Fink-Jensen, Executive Director, CTDA-North  
Ed Cohn, Executive Director, CTDA-South

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-09 10:19:16

No Duplicates.

## **Comment 10 for Tire Pressure Regulation (tirepres09) - 15-1.**

First Name: Kevin

Last Name: Krause

Email Address: kevin.krause@baxterkrause.com

Affiliation: Ventech USA

Subject: Public Comment from Ventech USA

Comment:

Gentlemen: In response to the Proposed Modified Regulatory Language for 15-day Comment Period, I am writing on behalf of my company Ventech USA. The Ventech USA Pneuscan system is the world's most innovative system for automatically and quickly measuring tire pressure and tread depth. This system is being marketed presently to California-based fleet operators, vehicle service centers, rental car facilities, transit operators, airlines, etc. We applaud the State of California for leading the world in reducing climate change emissions through lowering fuel and maintenance costs and wear associated with underinflated tires. Having said this, Ventech is concerned that any revisions to the under inflated tire regulatory program adopted earlier by CARB, be made to strengthen the program and broaden its reach versus weakening or limiting its applicability. The technology to capture these carbon emissions is available now through systems like ours. Please be aware that any changes, no matter how small-seeming will be watched around the world and will be a signal sent that will impact our market and more importantly the reduction of the all-important associated emissions. We urge sensitivity to this impact and ask that no changes to the program be made that limit the program's reach.

Sincerely,

Kevin Krause

President, Ventech USA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-09 12:36:41

No Duplicates.